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15 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

16 SIGNIFY NORTH AMERICA CORPORATION and  
17 SIGNIFY HOLDING B.V.

18 Plaintiffs,

19 v.

20 LEPRO INNOVATION INC,  
LE INNOVATION INC,  
21 INNOVATION RULES INC.,  
HOME EVER INC., and  
22 LETIANLIGHTING, INC.,

23 Defendants.

Case 2:22-cv-02095-JAD-DJA

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**NOTICE OF ORDERS  
DENYING PRO HAC VICE  
APPLICATION OF  
NICHOLAS A. BROWN IN  
OTHER MATTERS (ECF 55)**

1 Plaintiffs Signify North America Corporation and Signify Holding B.V. (collectively,  
 2 “Signify”) hereby provide the Court with Notice of the Orders Denying the *Pro Hac Vice*  
 3 Applications of Nicholas A. Brown (attached hereto as Exhibits A and B) referenced in Mr.  
 4 Brown’s Verified Petition for Permission to Practice in this Case (“Petition”) (ECF 55). This  
 5 Notice is made to provide the Court with information relevant to the Petition that Plaintiffs believe  
 6 was incomplete or omitted from the Petition to aid the Court in assessing the Petition.

7 In his Petition, Mr. Brown acknowledges that his admission *pro hac vice* was denied or  
 8 withdrawn by the U.S. Patent Trial and Appeal Board (“PTAB”) in 10 Patent IPR proceedings,  
 9 because he did not disclose the public reproof he received from the State Bar of California in  
 10 connection with a 2004 California misdemeanor conviction.<sup>1</sup> In summarizing the Board’s orders,  
 11 denying and withdrawing admission, Mr. Brown states only that the “Board found [his]  
 12 interpretation of the Board’s rules as not requiring the disclosure of that [California Bar] reproof  
 13 was unreasonable”.<sup>2</sup>

14 A true and correct copy of the referenced Order denying Mr. Brown’s *pro hac vice*  
 15 admission is attached to this Notice as Exhibit A.<sup>3</sup> This Order gives a more complete explanation  
 16 than that set forth in the Petition. Pursuant to the Order, the Board denied and withdrew Mr.  
 17 Brown’s *pro hac vice* not merely because it found his interpretation of the Board’s requirement to  
 18 disclose his prior sanction unreasonable, but “[b]ecause Mr. Brown chose to make a false  
 19 statement in his Declaration in Support of Petitioner’s Motion for *Pro Hac Vice* Admission that  
 20 ‘[n]o sanction or contempt citation had been imposed against me by any court or administrative  
 21 body’.”<sup>4</sup>

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24<sup>1</sup> ECF 55, at 10.

25<sup>2</sup> *Id.*

26<sup>3</sup> Order for Denying Petitioner’s Motion for Pro Hac Vice Admission of Nicholas A. Brown, *Satco Prods., Inc., v.*  
 27 *Seoul Semiconductor Co., Ltd.*, IPR 2020-00836 (PTAB, Feb. 16, 2021), attached hereto as Exhibit A.

28<sup>4</sup> *Id.*, at 5.

Mr. Brown subsequently filed a Request for Rehearing of the Board's Order Denying his *pro hac vice* application. A true and correct copy of Order Denying the Request for Rehearing is attached hereto as Exhibit B.<sup>5</sup> The Board denied that Request as well.<sup>6</sup>

Dated: August 23, 2023

Respectfully submitted,

/s/ F. Christopher Austin

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*COUNSEL FOR PLAINTIFFS*  
*Signify North America Corporation and*  
*Signify Holding B.V.*

<sup>5</sup> Order Denying Petitioner's Request for Rehearing, *Satco Prods., Inc., v. Seoul Semiconductor Co., Ltd.*, IPR 2020-00836 (PTAB, Sep. 23, 2021), attached hereto as Exhibit B.

<sup>6</sup> *Id.*, at 5.

1                   **CERTIFICATE OF SERVICE**

2                   Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on August 23, 2023, a true and correct  
3 copy of the foregoing was filed electronically via the Court's CM/ECF system. Notice of filing  
4 will be served on all parties by operation of the Court's EM/ECF system, and parties may access  
5 this filing through the Court's CM/ECF system.

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8                   */s/ F. Christopher Austin*  
An employee of Weide & Miller, Ltd.  
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